

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

DIGITAL EGG INVESTMENTS, LLC

Plaintiff,

v.

GREEN STANDARD NEW TECHNOLOGY
SOLUTIONS, LLC, JERIC S. DEVELA,
and CHARLES YANEZ,

Defendants.

Civil Action – Law

No. 21cv1762

**MOTION FOR DEFAULT JUDGMENT FOR A SUM CERTAIN AS TO DEFENDANTS
GREEN STANDARD NEW TECHNOLOGY SOLUTIONS, LLC AND
JERIC S. DEVELA PURSUANT TO FED. R. CIV. P. 55(b)(1)**

Plaintiff, Digital Egg Investments, LLC (“Plaintiff”), by and through its undersigned counsel, Buchanan Ingersoll & Rooney PC, files the following Motion for Default Judgment for a Sum Certain as to Defendants Green Standard New Technology Solutions, LLC (“Green Standard”) and Jeric S. Devela (“Devela”) Pursuant To Fed. R. Civ. P. 55(b)(1) (“Motion”), and in support thereof, states as follows:

1. Green Standard and Devela failed to plead or otherwise defend as required by the Federal Rules of Civil Procedure, as appears from the affidavit of Josh Gray (“Gray Affidavit”), attached hereto as **Exhibit A**.

2. As set forth in the Gray Affidavit, Defendants Green Standard and Devela are indebted to the Plaintiff in the sum certain of \$ \$621,580.03 as of September 22, 2021, exclusive of legal fees and interest accruing at the rate set forth in the Complaint.

3. As further set forth in the Gray Affidavit, the summons and complaint in this action were duly served upon Defendants Green Standard and Devela, the deadline to respond to

the complaint has passed, and Defendants Green Standard and Devela have failed to respond or otherwise answer the Complaint.

4. On December 21, 2021, the Clerk entered Defaults as to Green Standard and Devela (Dkts. 11,12).

WHEREFORE, Plaintiff respectfully requests that money judgment be entered by default against Defendants Green Standard and Devela, jointly and severally, in the amount of \$621,580.03 as of September 22, 2021.

Dated: January 14, 2022

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC

/s/ Erin H. Conroy

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